

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CHRISTINE ALBERTO,

Plaintiff,

-against-

MICHAEL MORALES OF THE NEW YORK CITY POLICE DEPARTMENT, WILLIAM PERRY OF THE NEW YORK CITY POLICE DEPARTMENT, OFFICERS JOHN DOE OF THE NEW YORK CITY POLICE DEPARTMENT, NEW YORK CITY POLICE COMMISSIONER WILLIAM J. BRATTON, FIONNUALA O'DOHERTY, ASSISTANT DISTRICT ATTORNEY OF THE NEW YORK COUNTY DISTRICT ATTORNEY'S OFFICE, MIREILLE DEE, ASSISTANT DISTRICT ATTORNEY OF THE NEW YORK COUNTY DISTRICT ATTORNEY'S OFFICE, CYRUS R. VANCE, JR., DISTRICT ATTORNEY OF THE NEW YORK COUNTY DISTRICT ATTORNEY'S OFFICE, THE NEW YORK COUNTY DISTRICT ATTORNEY'S OFFICE, AND THE CITY OF NEW YORK,

Defendants.

15 cv 9449

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law and papers herein, the undersigned will move this Court at the United States Courthouse, 40 Foley Square, New York, New York 10007, on a date to be determined by the court, for an order pursuant to 12(b)(6) of the Federal Rules of Civil Procedure dismissing the complaint as to District Attorney Cyrus R. Vance, Assistant District Attorney Fionnuala O'Doherty, Assistant District Attorney Mireille Dee and the

New York County District Attorney's Office for failure to state a claim upon which relief may be granted, and for any other fair and equitable relief that may be appropriate.

CYRUS R. VANCE, JR.
District Attorney, New York County
as Special Assistant Corporation Counsel
One Hogan Place
New York, New York 10013
(212) 335-4364 (telephone)
(212) 335-4390 (facsimile)

By: _____/S/_____
Susan C. Roque
Assistant District Attorney
Of Counsel

TO: *via ECF and regular mail*

Attorney for NYC defendants

Cherie N. Brown
Assistant Corporation Counsel
Special Federal Litigation Division
New York City Law Department
100 Church Street
New York, New York 10007

Attorney for plaintiff

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